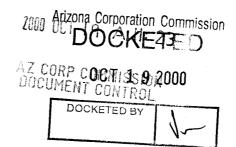
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ORIGINAL

October 18, 2000

Arizona Corporation Commission Docket Control Center 1200 West Washington Street Phoenix, AZ 85007-2996



MANCIVEU

Natalie L. Hocken nhocken@hewm.com (503) 795-7422 Main (503) 227-7400 Fax (503) 241-0950

Re: In the Matter of the Joint Application Between Citizens Utilities Company and Cap Rock Energy Corporation for the Approval of the Sale of Certain Electric Utility Properties in Arizona and the Transfer of the Certificate of Convenience and Necessity from Citizens to Cap Rock

Docket Nos.: E-01032A-00-0163, E-01032B-00-0163, E-01032C-00-0163, E-020514, 00, 0163

03851A-00-0163

Dear Docket Control Center:

Enclosed please find the original and 10 copies of the Joint Motion to Suspend the Procedural Schedule and Memorandum in Support of Joint Motion to Suspend the Procedural Schedule in the above-referenced matter.

Very truly yours,

Natalie L. Hocken

Enclosure

155785 v01.SE (3C7D01!.DOC) 10/18/00 11:22 AM (26601.0001)

ORIGINAL BEFORE THE ARIZONA CORPORATION COMMISSION VED

CARL J. KUNASEK
CHAIRMAN
JIM IRVIN
COMMISSIONER
WILLIAM A. MUNDELL
COMMISSIONER

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AZ CORP COMMISSION COCUMENT CONTROL

IN THE MATTER OF THE JOINT
APPLICATION BETWEEN CITIZENS
UTILITIES COMPANY AND CAP ROCK
ENERGY CORPORATION FOR THE
APPROVAL OF THE SALE OF CERTAIN
ELECTRIC UTILITY PROPERTIES IN
ARIZONA AND THE TRANSFER OF THE
CERTIFICATE OF CONVENIENCE AND
NECESSITY FROM CITIZENS TO CAP
ROCK

Docket No. E-01032A-00-0163 Docket No. E-01032B-00-0163 Docket No. E-01032C-00-0163 Docket No. E-03851A-00-0163

JOINT MOTION TO SUSPEND THE PROCEDURAL SCHEDULE

Cap Rock and Citizens ("the applicants") respectfully request that the procedural schedule in the above-captioned matter be suspended pending further notice. The applicants will provide a comprehensive status report to all interested parties to the proceeding no later than November 17, 2000, at which time the continued suspension of the procedural schedule will be revisited.

The applicants have conferred with all parties to this proceeding (including intervention applicants: Sulphur Springs Valley Electric Cooperative, Inc. and IBEW Local 769) regarding the motion. The Arizona Corporation Commission Staff is opposed to the motion; all other parties agree to the motion.

The applicants' motion is supported by the accompanying Memorandum in Support of Joint Motion to Suspend The Procedural Schedule.

PAGE 1 – JOINT MOTION TO SUSPEND THE PROCEDURAL SCHEDULE

We hereby respectfully request the suspension of the procedural schedule subject to 2 the conditions set forth herein. 3 Dated: October 18th, 2000 Dated: October 18, 2000 5 6 Natalie L. Hocken Vice President and General Counsel Heller, Ehrman, White & McAuliffe, LLP 200 SW Market Street, Suite 1750 7 Citizens Communications Company High Ridge Park Portland, Oregon 97201-5718 Phone: (503) 795-7420 8 Stamford, Connecticut 06905 Phone: (203) 614-5047 Fax: (503) 241-0950 Fax: (203) 614-4651 9 Attorneys for Cap Rock Energy Corporation and Cap Rock Electric 10 Cooperative, Inc. 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27

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CERTIFICATE OF SERVICE

Copies of the JOINT MOTION TO SUSPEND THE PROCEDURAL
SCHEDULE and MEMORANDUM IN SUPPORT OF JOINT MOTION TO
SUSPEND THE PROCEDURAL SCHEDULE were mailed on October 18, 2000 to the
following:

Hon. Jerry Rudibaugh
Chief Administrative Law Judge
Arizona Corporation Commission
Hearing Division
1200 West Washington
Phoenix, AZ 85007
(also via facsimile)

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Janet Wagner
Teena Wolfe
Arizona Corporation Commission
Legal Division
1200 West Washington
Phoenix, AZ 85007-2996

Scott Wakefield Daniel Pozefsky RUCO 2828 North Central Avenue, Suite 1200 Phoenix, AZ 85004

Walter M. Meek, President Arizona Utility Investors Association 2100 North Central Avenue, Suite 210 Phoenix, AZ 85004

Marvin Lustiger 5105 N. 79th Place Scottsdale, AZ 85250

Andrew W. Bettwy Debra Jacobson Southwest Gas Corporation 5241 Spring Mountain Road Las Vegas, NV 89102

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Christine L. Nelson Deborah L. Herbert William J. Ekstrom, Jr. Mohave County PO Box 7000 Kingman, AZ 86402

Christopher Hitchcock Sulphur Springs Valley Electric Cooperative, Inc. Hitchcock, Hicks & Conlogue Post Office Box 87 Copper Queen Plaza Bisbee, AZ 85603-0087

Joel Bell IBEW Local 769 3232 North 20th Street Phoenix, AZ 85016

155332 v02.SE (3B%S02!.DOC) 10/18/00 10:51 AM (26601.0001)